

DOCKET FILE COPY ORIGINAL

Before the
Federal Communication Commission
Washington, D. C. 20554

In the Matter of

Replacement of Part 90
by Part 88 to Revise
the Private Land Mobile
Radio Services and Modify
the Policies Governing them

) PR Docket 92-235
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To: The Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENT OF

Marshall Communications
P. O. Box 203
Whiteland, Indiana 46184

Marshall Communications submits its comments in response to the Commission's Notice of Proposed Rule Making in this proceedings.

1. This plan (Part 88) should not be implemented in it's present form and time frame. It will put a severe financial burden on small farms and businesses who are presently using radios under Part 90. These users will be forced to purchase expensive new radio equipment using unproven narrowband technologies.

2. No refarming until early 2000's.

3. Changes to be implemented in top metropolitan areas first (possible top 10) then 5 to 10 years in rural areas.

4. The consolidation of land mobile services will eliminate the present system of checks and balances between the FCC, coordinators and spectrum users. It should not be implemented.

Respectfully submitted,

MARSHALL COMMUNICATIONS

[Signature]